

1 PETER N. HADIARIS, ESQ.
State Bar No. 122590
2 600 Harrison St., Ste 120
San Francisco, CA 94107
3 (415) 593-0077
Attorney for debtors
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6 UNITED STATES BANKRUPTCY COURT
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8 NORTHERN DISTRICT OF CALIFORNIA

9 In Re:)
ALAN B. ROGERS, et al) No. 03-57499
10 Debtor(s)) Chapter 7
11)
12 DEBTOR'S OBJECTION
TO SALE OF REAL PROPERTY

13 The debtor objects to the sale of the real property on
14 Seaport Blvd, Redwood City, CA, on the following grounds:

15 1. The property is exempt as the debtor's homestead, and
16 cannot be sold profitably by the trustee as a result. In
17 addition to the debtor's homestead exemption, there are almost
18 \$30,000 in property taxes overdue, a deed of trust for
19 approximately \$10,000, and more than \$20,000 in sale expenses
20 given the trustee's agreement to pay a 10% brokerage commission.

21 2. Even if there were equity for the trustee to realize,
22 the other occupant of the property, Ulla Jacobson, claims an
23 equitable ½ interest in the property due to her pre-petition
24 agreement with the debtor and shared payment of property taxes,
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1 mortgage payments, and maintenance expenses over the past fifteen
2 years.

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4 PETER N. HADIARIS, ESQ.

5 **Peter N. Hadiaris**
6 Peter N. Hadiaris, Esq.
7 Attorney for debtor
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